

1-Whether Plaintiff was discriminated against on the basis of her age, sex, and race, when she was denied promotion to the Central Prison Health Care Complex (CPHCC) Chief Executive Officer position in which she had been working for over two years, and for which she was selected as the most qualified applicant on the first and second positions of the position but which she was denied after a new interview panel selected for a third posting rejected her in favor of a younger, male, white applicant who had been deemed unqualified when he applied on the second posting of the position; and

2-Whether ,after she complained about the discriminatory denial of promotion, Defendants retaliated against her by issuing her a unwarranted disciplinary action, instigating false allegations of misconduct against her, transferring her as a result of the false allegations to a Medical Records position at Women's Prison for over three years, when the investigation found no evidence of misconduct on Plaintiff's part in two months, failing to discipline the person who made the false allegations, and then attempting to return Plaintiff to a position where she would be supervised by the person who made the false allegations against her, and as an alternative, offering her a ten pay grade demotion, which resulted in Plaintiff seeking short-term disability.

WHEREFORE, Plaintiff implores this Court to Order Defendants to produce the documents listed in Exhibit 3 within a specific period of time after the Court's Order and prior to any extension of the dispositive motion deadline.

Respectfully submitted, this 12th day of May 2023.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing **ADDITIONAL RESPONSE IN SUPPORT OF PLAINTIFF'S MOTION TO COMPEL [DE41]** was served by filing the document electronically via the CM/ECF system, which will send notification of such filing to all counsel of record.

This 12th day of May 2023.

/S/ VALERIE BATEMAN
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